

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
(Charlotte Division)

| | | |
|--------------------------|---|-------------------|
| In re: |) | Chapter 11 |
| |) | |
| B GSE GROUP, LLC, |) | Case No. 23-30013 |
| |) | |
| Debtor. |) | |

RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

Now comes debtor B GSE Group, LLC (the “Debtor”) and objects to *Creditor John Bean Technologies Corporation’s Motion for Entry of Order for Limited Relief from the Automatic Stay to Finalize Litigation Pending in the United States District Court for the District of Utah* (the “Stay Relief Motion”) [Doc. 28] filed by John Bean Technologies Corporation. The Debtor respectfully requests: (1) that a hearing be held on the Stay Relief Motion; (2) that the Stay Relief Motion be denied in whole or in part; (3) alternatively, in the event the Stay Relief Motion is allowed, that the 14-day stay set forth in Bankruptcy Rule 4001(a)(3) not be waived; and (4) that the Court grant such other relief as is just and proper.

Dated: Charlotte, North Carolina
January 26, 2023

MOON WRIGHT & HOUSTON, PLLC

/s/ Richard S. Wright
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Counsel for the Debtor

CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Response to Motion for Relief from Automatic Stay* was served by electronic notification on those parties registered with the United States Bankruptcy Court, Western District of North Carolina ECF system to receive notices for this case on the date shown below.

Dated: Charlotte, North Carolina
January 26, 2023

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